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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

SEP 07 2016

SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

UNITED STATES DISTRICT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

THARE JOSUE NAVARRO ROBLES,
ALEX GEOVANNI ZEPEDA
MORALES and
ANDRES GONZALES,

Defendants.

4:16-CR-6019-EFS

SUPERSEDING
INDICTMENT

21 U.S.C. §§ 841(a)(1),
(b)(1)(A)(viii), 846
Conspiracy to Distribute 500 Grams
or More of Methamphetamine
(Count 1)

21 U.S.C. § 841(a)(1), (b)(1)(A)(viii)
and 18 U.S.C. § 2
Distribution of 50 Grams or More of
Actual (Pure) Methamphetamine
(Count 2)

21 U.S.C. § 841(a)(1), (b)(1)(A)(viii)
Possession with Intent to Distribute
500 Grams or More of
Methamphetamine
(Count 3)

21 U.S.C. § 841(a)(1), (b)(1)(A)(i)
Possession with Intent to Distribute
1 Kilogram or More of Heroin
(Count 4)

21 U.S.C. § 841(a)(1), (b)(1)(B)(ii)
Possession with Intent to Distribute
500 grams or More of Cocaine
(Count 5)

21 U.S.C. § 853
Forfeiture Allegations

The Grand Jury Charges:

COUNT ONE

That beginning on a date unknown, but by early March 2016, and continuing until on or about March 30, 2016, in the Eastern District of Washington and elsewhere, the Defendants, THARE JOSUE NAVARRO ROBLES, ALEX GEOVANNI ZEPEDA MORALES, and ANDRES GONZALES and other individuals, both known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate and agree together with each other to commit the following offense against the United States, to wit: distribution of 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii), 846.

COUNT TWO

That on or about March 17, 2016, in the Eastern District of Washington, the Defendants, THARE JOSUE NAVARRO ROBLES and ALEX GEOVANNI ZEPEDA MORALES, did knowingly and intentionally distribute 50 grams or more of actual (pure) methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(viii) and 18 U.S.C § 2.

COUNT THREE

That on or about March 30, 2016, in the Eastern District of Washington, the Defendant, ALEX GEOVANNI ZEPEDA MORALES and ANDRES GONZALES, knowingly and intentionally possessed with intent to distribute 500

1 grams or more of a mixture or substance containing a detectable amount of
2 methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §
3 841(a)(1), (b)(1)(A)(viii).

4 **COUNT FOUR**

5
6 That on or about March 30, 2016, in the Eastern District of Washington, the
7 Defendant, ALEX GEOVANNI ZEPEDA MORALES, knowingly and
8 intentionally possessed with intent to distribute 1 kilogram or more of a mixture
9 or substance containing a detectable amount of heroin, a Schedule II controlled
10 substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(i).

11 **COUNT FIVE**

12 That on or about March 30, 2016, in the Eastern District of Washington, the
13 Defendant, ALEX GEOVANNI ZEPEDA MORALES, knowingly and
14 intentionally possessed with intent to distribute 500 grams or more of a mixture or
15 substance containing a detectable amount of cocaine, a Schedule II controlled
16 substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(ii).

17 **NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS**

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19 The allegations contained in this Indictment are hereby re-alleged and
20 incorporated by reference for the purpose of alleging forfeitures.

21 Pursuant to 21 U.S.C. § 853, upon conviction of an offense of violation of
22 21 U.S.C. § 841(a)(1), THARE JOSUE NAVARRO ROBLES, ALEX
23 GEOVANNI ZEPEDA MORALES, and ANDRES GONZALES shall forfeit to
24 the United States of America, any property constituting, or derived from, any
25 proceeds obtained, directly or indirectly, as the result of such offense(s) and any
26 property used or intended to be used, in any manner or part, to commit or to
27 facilitate the commission of the offense(s).
28

1 The property to be forfeited by ALEX GEOVANNI ZEPEDA MORALES
2 includes, but is not limited to: a 2007 Chrysler 300, California License Plate:
3 7NYM181, VIN: 2C3LA73W27H660148.

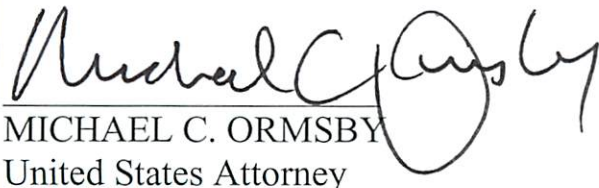
4 If any forfeitable property, as a result of any act or omission of the
5 Defendants:


- 6 (a) cannot be located upon the exercise of due diligence;
7 (b) has been transferred or sold to, or deposited with, a third party;
8 (c) has been placed beyond the jurisdiction of the court;
9 (d) has been substantially diminished in value; or
10 (e) has been commingled with other property which cannot be divided
11 without difficulty;
12

13 the United States of America shall be entitled to forfeiture of substitute property
14 pursuant to 21 U.S.C. § 853(p).

15 DATED this 1st day of September, 2016.

16 A TRUE BILL

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24 Stephanie Van Marter
25 Assistant United States Attorney

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